

October 16, 2020

Via: ECF

Hon. Douglas E. Arpert, U.S.M.J. U.S. District Court for the District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

Re: In Re: Application of California State Teachers' Retirement System

Docket No. 19-cv-16458 (FLW)(DEA)

Dear Judge Arpert:

As the Court is aware, we represent applicant California State Teachers' Retirement Statement ("CalSTRS") in connection with the above Action. While we do not intend to add to an already clear record, we do believe a brief clarification of the knowing misrepresentations by the Respondents is in order. (Remember, their entire goal here is to avoid discovery.) The lead argument in their opposition is misleading in that it argues that CalSTRS should have sought relief by Order to Show Cause immediately after the Danish court denied the motion to stay the Danish proceedings dated September 1, 2020 and issued a scheduling order dated September 4, 2020. In fact, CalSTRS did not learn of the Danish court's decision on the motion to stay until September 15, 2020. It sought translated copies of the Danish court orders, which it received on October 6, 2020, and filed its papers in support of the Order to Show Cause the next day. If that is all they have, which it no seems clear, it is obvious that they have no good-faith argument against the disclosure that has been twice ordered by this Court.

Respectfully,

LAW OFFICE OF N. ARI WEISBROT LLC

By:

Nathaniel Ari Weisbrot

cc: All Counsel of Record (Via ECF)